

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

In re:)
) Case No. 13-53846
)
CITY OF DETROIT, MICHIGAN,)
) In Proceedings Under
) Chapter 9
Debtor.)
) Hon. Steven W. Rhodes
)
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**WAYNE COUNTY’S THIRD AMENDED WITNESS LIST IN CONNECTION WITH
CONFIRMATION OF THE DEBTOR’S FOURTH AMENDED PLAN OF ADJUSTMENT**

Wayne County, Michigan, a Michigan Constitutional corporation, a party-in-interest in this case, by and through its County Executive, Robert A. Ficano (“Wayne County”), states that it may call the following fact witnesses at the Confirmation Hearing:

Number	Name	Topics:
1.	Solon Phillips, Wayne County Deputy Chief of Staff to Wayne County Executive	<ul style="list-style-type: none">• Plan Feasibility• Debtor’s Good Faith
2.	Kenneth Kucel, Deputy Director, Public Services	<ul style="list-style-type: none">• Plan Feasibility• DWSD Operations and Capital Needs
3.	Mark Abbo, Wayne County CFO	<ul style="list-style-type: none">• Plan Feasibility• DWSD Economics
4.	Kelly Cave, Chief Engineer, Wayne County Department of Environment	<ul style="list-style-type: none">• DWSD Capital Needs• Feasibility of continuation of DWSD in present form.
5.	Elmeka Steele, Director, Wayne County Facilities Management, Department of Public Service, Environmental Services	<ul style="list-style-type: none">• Plan Feasibility• DWSD Operations and Capital Needs
6.	Sue F. McCormick, Director DWSD	<ul style="list-style-type: none">• Plan Feasibility• DWSD Operations• DWSD Capital Needs

		<ul style="list-style-type: none"> • DWSD History • Viability of DWSD as currently operating
7.	Nicolette Bateson, CFO, DWSD	<ul style="list-style-type: none"> • Plan Feasibility • DWSD Operations • DWSD Capital Needs • DWSD History • Viability of DWSD as currently operating
8.	Bart Foster, rate consultant to DWSD	<ul style="list-style-type: none"> • Plan feasibility • Effect of Plan on DWSD rates • Effect of DWSD rates on poverty in City of Detroit
9.	Vyto Kaunelis, OHM Advisors, advisor to City with respect to DWSD capital improvements	<ul style="list-style-type: none"> • Plan feasibility • DWSD capital improvement needs
10.	James Fausone – Chairperson, DWSD Board of Water Commissioners	<ul style="list-style-type: none"> • Plan feasibility
11.	Any witness listed on any other witness list filed	
12.	Any rebuttal witnesses	
13.	Any witness necessary to authenticate any documents.	

Wayne County reserves the right to supplement the testimony topics associated with any witness and to amend its witness list as may be necessary.

Respectfully Submitted,

BUTZEL LONG, a professional Corporation

/s/ Max J. Newman
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Dated: June 20, 2014